



METROPOLITAN
TRANSPORTATION
COMMISSION

Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607-4700
TEL 510.817.5700
TDD/TTY 510.817.5769
FAX 510.817.5848
E-MAIL info@mtc.ca.gov
WEB www.mtc.ca.gov

Memorandum

TO: Air Quality Conformity Task Force

DATE: January 21, 2010

FR: Ashley Nguyen

W.I.:

RE: Approach to Conformity Analysis for the 2013 Transportation Improvement Program

MTC staff is in the process of preparing the 2013 Transportation Improvement Program (TIP). See **Agenda Item #3a** for more details.

Since the 2013 TIP does not include any new regionally significant projects beyond those currently included in the Transportation 2035 Plan, and these projects have been modeled in the appropriate horizon year using the latest planning assumptions, the conformity rule allows for the reliance on the previous regional emissions analysis for conformity determinations on TIPs that are consistent with the RTP (40 CFR §93.122(g)). Thus, MTC staff proposes to use the latest conformity analysis for the Transportation 2035 Plan and 2011 Transportation Improvement Program as the basis for the conformity determination for the 2013 TIP. The latest conformity analysis is included in the report "Final Transportation Air Quality Conformity Analysis for the Transportation 2035 Plan and 2011 Transportation Improvement Program," which was approved by FHWA/FTA, in consultation with US EPA, on December 14, 2010. Note that this latest conformity determination includes regional conformity to the PM_{2.5} requirements, which took effect on December 14, 2009.

MTC staff seeks the Conformity Task Force's review of the proposed approach to conform the 2013 TIP in accordance with federal conformity shown in the latest conformity report, as described below.

For purposes of the conformity analysis, we intend to state for the record:

1. **Latest Planning Assumptions, Emissions Model and Budget Comparison:** No new regional emissions analysis is necessary for the conformity determination for the 2013 TIP. This conformity determination is based on the regional emissions analysis performed for the Transportation 2035 Plan and 2011 TIP. The latest planning assumptions, emissions model and budget comparisons are as reflected in the regional emissions analysis. Please refer to the above referenced conformity report for details on this analysis.
2. **TCM Implementation:** The Transportation Control Measures (TCMs) A through E in the approved 2001 Ozone Attainment Plan are fully implemented. All information on the timely implementation of the TCMs in the above referenced conformity report is still current.
3. **Reliance on the Previous Regional Emissions Analysis:** Since the conformity determination for the 2013 TIP relies on the previous regional emissions analysis, MTC is required to meet the requirements of 40 CFR §93.122(g).

The 2013 TIP meets these requirements:

- The TIP contains all the projects, which must be started in the TIP's timeframe in order to achieve the highway and transit system envisioned in by the regional transportation plan (Transportation 2035 Plan).
 - All TIP projects which are regionally significant are included in the Transportation 2035 Plan and have a design concept and scope adequate to determine their contribution to the Transportation 2035 Plan's regional emissions at the time of the regional transportation plan's conformity determination. Note that there are no new non-exempt, regionally significant projects being proposed for the 2013 that was not already identified in the financially constrained Transportation 2035 Plan.
 - The design concept and scope of each regionally significant project in the TIP is not significantly different from those described in the Plan.
 - All projects in the 2013 TIP are from a conforming Plan. Allocating funds to these projects will not delay the implementation of projects in the Plan or TIP, which are necessary to achieve the highway and transit system envisioned by the Plan.
4. **Results of Previous Regional Emissions Analysis Comparing the Motor Vehicle Emissions to Budgets:** Motor vehicle emissions in the Bay Area must not exceed the applicable budgets measured in tons per day for the volatile organic compounds (VOCs), nitrogen oxides (NOx) and carbon monoxide (CO) as contained in the State Implementation Plan (SIP). MTC will provide documentation of the vehicle activity forecasts and motor vehicle emissions calculations from the previous emissions analysis. The results of the previous regional emissions analysis show that regional emissions are below the applicable budgets. In addition, MTC will provide documentation of the PM_{2.5} regional emissions analysis, which was based on No Build/Build emissions test. Please refer to the above referenced conformity report for details on this analysis.
5. **Financial Constraint:** The 2013 TIP is financially constrained based on revenue estimates from the State at the time of its preparation.
6. **Interagency and Public Consultation:** MTC will conduct the appropriate agency and public consultation for the 2013 TIP and conformity analysis.

Attachment A: Draft Schedule

Attachment A: Draft Schedule for Conformity Analysis of 2013 TIP

Activity	Timeline
Conformity Task Force Reviews Proposed Conformity Approach	April 26, 2012
MTC Staff Conducts Technical Analysis & Report Preparation	May 2012
Conformity Task Force Reviews Administrative Draft Conformity Analysis	May 24, 2012
MTC's Programming and Allocations Committee (PAC) Authorizes Release of Draft 2013 TIP and Draft Conformity Analysis	July 13, 2012
Start of 30-Day Public Review of Draft 2013 TIP and Draft Conformity Analysis	June 22, 2012
Public Hearing of Draft 2013 TIP and Draft Conformity Analysis	July 11, 2012
Conformity Task Force Reviews Proposed Final 2013 TIP and Proposed Final Conformity Analysis (Includes Response to Comments)	August 23, 2012
PAC Approves Final 2013 TIP and Final Conformity Analysis	September 12, 2012
Commission Approves Final 2013 TIP and Final Conformity Analysis	September 26, 2012
Caltrans Reviews and Approves FSTIP	November 15, 2012
FHWA/FTA Approves Conformity Determination	By December 17, 2012